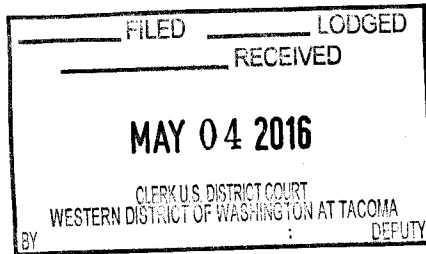


The Honorable Robert J. Bryan



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERALD JAMES LESAN,

Defendant.

NO. CR15-387RJB

**SUPERSEDING INFORMATION**

The United States Attorney charges that:

**COUNT 1**

**(Access with Intent to View Child Pornography)**

Beginning on a date unknown but continuing until on or about November 9, 2015, at Everett, within the Western District of Washington, and elsewhere, GERALD JAMES LESAN knowingly accessed with intent to view matter that contained visual depictions, the production of which involved the use of minors, prepubescent minors, and minors under the age of twelve years engaging in sexually explicit conduct and which were of such conduct, that had been mailed and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that had been produced using materials that had been mailed and shipped

1 and transported using any means and facility of interstate and foreign commerce,  
2 including by computer.

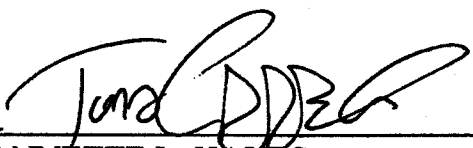
3 All in violation of Title 18, United States Code, Section 2252(a)(4)(B), (b)(2).

4 **ALLEGATIONS OF FORFEITURE**

5 Upon conviction of the offenses alleged in Count 1 of this Superseding  
6 Information, GERALD JAMES LESAN shall forfeit to the United States, pursuant to  
7 Title 18, United States Code, Section 2253, any property, real or personal, used or  
8 intended to be used to commit or promote the commission of such offenses, or any  
9 property traceable to such property, and any and all visual depictions as described in Title  
10 18, United States Code, Sections 2251, 2252, and 2252A, which were produced,  
11 transported, mailed, shipped, or received, in violation of Chapter 110, Title 18, United  
12 States Code, including but not limited to:

- 13 a. 1 Black Generic SeaSonic Computer Tower w/ monitor cable seized from  
14 GERALD JAMES LESAN on or about November 9, 2015; and  
15 b. any and all images of child pornography, in whatever format and however  
16 stored.

17 Dated this 2<sup>nd</sup> day of May, 2016

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20   
21 ANNETTE L. HAYES  
22 United States Attorney

23   
24 MICHAEL DION  
25 Assistant United States Attorney

26   
27 MATTHEW P. HAMPTON  
28 Assistant United States Attorney